

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF GOOGLE LLC'S
OPPOSITION TO PLAINTIFFS'
SUPPLEMENTAL SANCTIONS BRIEF
PURSUANT TO DKT. 624**

Magistrate Judge: Hon. Susan Van Keulen

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit
4 this declaration in support of Google’s Opposition to Plaintiffs’ Supplemental Sanctions Brief
5 Pursuant to Dkt. 624. I make this declaration of my own personal, firsthand knowledge, and if called
6 and sworn as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of Google’s March 1, 2022
8 letter to the Special Master and Plaintiffs.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the April 21,
10 2022 hearing transcript.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document Google
12 produced to Plaintiffs, bearing Bates number GOOG-CABR-00892455.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document Google
14 produced to Plaintiffs, bearing Bates number GOOG-CABR-04750983.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript
16 of the June 16, 2021 Rule 30(b)(6) deposition of Google’s corporate designee Glenn Berntson.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript
18 of the February 18, 2022 deposition of ex-Google employee Rory McClelland.

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript
20 of the March 23, 2022 deposition of Google employee Steve Ganem.

21 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript
22 of the July 18, 2022 deposition of Plaintiffs’ expert Bruce Schneier.

23 10. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the transcript
24 of the July 21, 2022 deposition of Plaintiffs’ expert Jonathan Hochman.

25 11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the
26 transcript of the November 24, 2021 deposition of Google employee AbdelKarim Mardini.

27 12. Attached hereto as **Exhibit 11** is a true and correct copy of Google’s November 6,
28 2020 Responses and Objections to Plaintiffs’ Request for Admission No. 7.

13. Attached hereto as **Exhibit 12** is a true and correct copy of Google's January 20, 2022 Responses and Objections to Plaintiffs' Request for Admission No. 47.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California on August 18, 2022.

By /s/ Viola Trebicka
Viola Trebicka